



THE LAW OFFICE OF

TRICIA S. LINDSAY

Civil Rights
Labor Law
Criminal Defense
Family Law
Wills, Trusts, and Estate

January 31, 2025

VIA ECF

Honorable Judge Gabriel Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Sai Malena Jimenez-Fogarty v. Thomas Fogarty, et al.
Case No.: 1:24-CV-08705-JLR

Dear Judge Gorenstein:

This office is incoming counsel for the plaintiff, Sai Malena Jimenez-Fogarty in the above captioned matter.

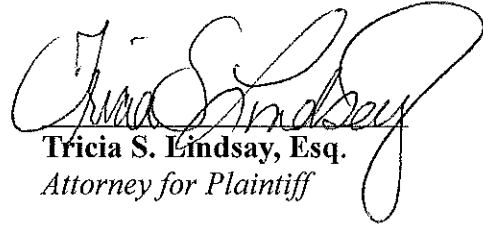
As the newly appearing counsel for Ms. Jimenez, I am requesting time to thoroughly review the case file, consult with my client, and make any necessary amendments to the operative *Complaint* which was recently amended and filed on January 17, 2025. As Ms. Jimenez-Fogarty was a Pro Se Plaintiff when both the initial and amended complaints were filed, I need to review each one as well as the other documents on the docket, including Defendants' pleadings, to ensure that the *Complaint* accurately reflects the facts and legal arguments pivotal to this case, as well as I need to be clear on the status and needs of the case thus far. This will also allow me to adhere to the standards of due diligence and professional responsibility expected of me.

Given the complexity of the case and my recent entry on the matter as legal representation, I respectfully request an extension until January 19, 2025 to file a second amended complaint, and an extension of eight (8) days until January 18, 2025, to file Plaintiff's *Reply* to Defendant Thomas Fogarty's *Opposition to Plaintiff's Motion to Disqualify*, which is currently due on January 10, 2025. This extension is crucial to provide the court with a comprehensive and well-prepared pleading and *Reply* motion as well as to avoid any undue prejudice to the parties involved.

I thank the Court for its consideration.

Lindsay-Hon. Judge Gorenstein
January 31, 2025
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Respectfully,



Tricia S. Lindsay, Esq.
Attorney for Plaintiff

cc: All Counsel of record (via ECF only)